



U.S. Department of Justice

*United States Attorney
Northern District of Ohio*

United States Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113-1852

July 19, 2024

Ian N. Friedman
Eric C. Nemecek
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1360 East 9th Street
Suite 650
Cleveland, Ohio 44114
Attorneys for Davis Lu

Re: *United States v. Davis Lu*; No.: 1:21CR226

Dear Counsel:

On today's date, we are providing you via the file sharing portal USAfx the exhibits the Government intends to introduce in its case in chief and the Government's initial Jencks disclosure in compliance with *Jencks v. United States* 353 U.S. 657 (1957) and its progeny.

The Jencks disclosure includes the following documents:

| Name | Size | Type | Date Modified |
|---|------|-----------------------------------|-----------------------|
| 7.19 Jencks Letter.pdf | 223K | Adobe Acrobat Document | 7/19/2024 10:49:07 AM |
| Defense presentation with Eaton Mark Ups.pptx | 145K | Microsoft PowerPoint Presentation | 7/10/2023 2:30:39 PM |

Jason Koler

| Name | Size | Type | Date Modified |
|-----------------------|------|------------------------|-----------------------|
| 01.06.2021.pdf | 201K | Adobe Acrobat Document | 7/17/2024 3:51:53 PM |
| 01.10.20_Redacted.pdf | 250K | Adobe Acrobat Document | 7/17/2024 4:19:36 PM |
| 03.29.21.pdf | 103K | Adobe Acrobat Document | 7/17/2024 3:21:15 PM |
| 03.30.21.pdf | 131K | Adobe Acrobat Document | 7/17/2024 2:30:33 PM |
| 09.12.19_Redacted.pdf | 305K | Adobe Acrobat Document | 7/17/2024 4:25:04 PM |
| 09.20.19.pdf | 295K | Adobe Acrobat Document | 7/17/2024 2:57:19 PM |
| 1.20.22_Redacted.pdf | 383K | Adobe Acrobat Document | 7/16/2024 10:52:51 AM |
| 1.24.22.pdf | 287K | Adobe Acrobat Document | 7/16/2024 10:33:38 AM |
| 10.12.21_Redacted.pdf | 256K | Adobe Acrobat Document | 7/16/2024 11:20:23 AM |
| 10.14.21_Redacted.pdf | 242K | Adobe Acrobat Document | 7/16/2024 11:23:11 AM |
| 10.4.21_Redacted.pdf | 116K | Adobe Acrobat Document | 7/16/2024 11:12:53 AM |
| 11.18.21_Redacted.pdf | 223K | Adobe Acrobat Document | 7/16/2024 11:28:49 AM |
| 11.2.21_Redacted.pdf | 512K | Adobe Acrobat Document | 7/16/2024 11:25:56 AM |
| 3.11.22.pdf | 246K | Adobe Acrobat Document | 5/22/2024 4:08:45 PM |
| 4.11.22.pdf | 612K | Adobe Acrobat Document | 5/22/2024 4:17:16 PM |
| 4.12.22(2).pdf | 291K | Adobe Acrobat Document | 7/16/2024 10:30:19 AM |
| 4.12.22.pdf | 301K | Adobe Acrobat Document | 5/22/2024 4:18:17 PM |
| 4.12.23_Redacted.pdf | 310K | Adobe Acrobat Document | 7/16/2024 10:57:07 AM |
| 4.28.22.pdf | 283K | Adobe Acrobat Document | 7/16/2024 10:27:48 AM |
| 5.12.22.pdf | 181K | Adobe Acrobat Document | 5/22/2024 4:20:09 PM |
| 7.29.23.pdf | 654K | Adobe Acrobat Document | 5/22/2024 4:30:03 PM |
| 7.31.23.pdf | 507K | Adobe Acrobat Document | 7/16/2024 10:20:26 AM |
| 8.29.22_Redacted.pdf | 308K | Adobe Acrobat Document | 7/16/2024 11:01:42 AM |
| 8.9.23.pdf | 501K | Adobe Acrobat Document | 5/22/2024 4:31:04 PM |
| 9.6.22_Redacted.pdf | 378K | Adobe Acrobat Document | 7/16/2024 11:10:48 AM |

Joe Corrigan

| Name | Size | Type | Date Modified |
|----------------|------|------------------------|----------------------|
| 06.28.2024.pdf | 397K | Adobe Acrobat Document | 7/16/2024 4:23:28 PM |

Kelly Roe

| Name | Size | Type | Date Modified |
|-------------------------|------|------------------------|----------------------|
| 07.17.2024_Redacted.pdf | 37K | Adobe Acrobat Document | 7/17/2024 4:38:14 PM |

Magesh Jayabal

| Name | Size | Type | Date Modified |
|-------------------------|------|------------------------|----------------------|
| 07.17.2024_Redacted.pdf | 256K | Adobe Acrobat Document | 7/17/2024 3:49:41 PM |

Monica Hantz

| Name | Size | Type | Date Modified |
|-------------------------|------|------------------------|----------------------|
| 01.06.2021.pdf | 201K | Adobe Acrobat Document | 7/17/2024 3:51:53 PM |
| 01.07.2020.pdf | 127K | Adobe Acrobat Document | 7/16/2024 3:58:18 PM |
| 01.10.2020_Redacted.pdf | 250K | Adobe Acrobat Document | 7/17/2024 4:19:36 PM |
| 03.04.2021_Redacted.pdf | 65K | Adobe Acrobat Document | 7/17/2024 3:55:40 PM |
| 03.22.2021.pdf | 155K | Adobe Acrobat Document | 7/16/2024 3:56:33 PM |
| 03.23.2021.pdf | 128K | Adobe Acrobat Document | 7/16/2024 3:57:39 PM |
| 03.29.2021.pdf | 103K | Adobe Acrobat Document | 7/17/2024 2:15:00 PM |
| 03.29.2021_Redacted.pdf | 45K | Adobe Acrobat Document | 7/16/2024 3:54:36 PM |
| 03.30.2021.pdf | 136K | Adobe Acrobat Document | 7/16/2024 3:58:56 PM |
| 04.14.2021 (2).pdf | 132K | Adobe Acrobat Document | 7/16/2024 4:13:49 PM |
| 04.14.2021.pdf | 114K | Adobe Acrobat Document | 7/16/2024 3:51:07 PM |
| 07.19.2021.pdf | 127K | Adobe Acrobat Document | 7/17/2024 2:16:24 PM |
| 09.02.2020_Redacted.pdf | 138K | Adobe Acrobat Document | 7/16/2024 4:12:46 PM |
| 09.12.2019_Redacted.pdf | 305K | Adobe Acrobat Document | 7/17/2024 4:25:04 PM |
| 09.14.2020.pdf | 146K | Adobe Acrobat Document | 7/16/2024 3:56:05 PM |
| 09.15.2020(2).pdf | 172K | Adobe Acrobat Document | 7/16/2024 4:07:36 PM |
| 09.15.2020.pdf | 171K | Adobe Acrobat Document | 7/16/2024 3:59:35 PM |
| 09.24.2019_Redacted.pdf | 69K | Adobe Acrobat Document | 7/17/2024 4:21:45 PM |
| 10.01.2019.pdf | 111K | Adobe Acrobat Document | 7/16/2024 4:16:54 PM |
| 10.19.2020.pdf | 179K | Adobe Acrobat Document | 7/16/2024 4:15:32 PM |
| 18334 Hantz 0401.pdf | 425K | Adobe Acrobat Document | 7/19/2024 1:31:30 PM |

Please notify me as soon as possible if any documents are not received or are otherwise inaccessible.

The production includes a PowerPoint presentation labeled “Defense presentation with Eaton Mark Ups.pptx”. This presentation consists of the presentation you originally provided us, with text added by a group of Eaton employees during calls. The calls were attended by multiple participants including Matthew Rose, Jay Ferguson and Magesh Jayabal. Jason Koler may have joined one of the calls.

If you have any other questions concerning your client’s case, please do not hesitate to contact me at (216) 622-3669. Thank you for your continued assistance in this matter.

Sincerely,



Daniel Riedl
Assistant U.S. Attorney